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COUNSEL FOR SCOTT M. SEIDEL, CHAPTER 7 TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	
GOODMAN NETWORKS, INC.,	§	Case No. 22-31641-mvl7
	§	(Chapter 7)
Debtor.	§	
<hr/>		
SCOTT M. SEIDEL, TRUSTEE, <i>et al.</i> ,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 23-03072-mvl
	§	
18920 NW 11TH, LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

**TRUSTEE’S MOTION TO COMPEL WRITTEN DISCOVERY RESPONSES
AND PRODUCTION OF DOCUMENTS FROM 18920 NW 11TH, LLC,
STEVEN ZAKHARYAYEV, AND EVELINA PINKHASOVA**

Scott M. Seidel, chapter 7 trustee (the “Trustee”) for Goodman Networks, Inc. (the “Debtor”), files this his *Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from 18920 NW 11th, LLC, Steven Zakharyayev, and Evelina Pinkhasova* (the “Motion”), in support of which the Trustee would respectfully show as follows:

For the reasons set forth in the *Brief in Support of Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from 18920 NW 11th, LLC, Steven*

Zakharyayev, and Evelina Pinkhasova, as supplemented by the *Appendix in Support of Trustee's Motion to Compel Written Discovery Responses and Production of Documents from 18920 NW 11th, LLC, Steven Zakharyayev, and Evelina Pinkhasova*, both of which are being filed contemporaneously with this Motion, the Court should overrule the discovery objections of 18920 NW 11th, LLC, Steven Zakharyayev, and Evelina Pinkhasova and compel them to answer the Trustee's interrogatories and produce documents in response to his requests for production.

RESPECTFULLY SUBMITTED this 21st day of June, 2024.

MUNSCH HARDT KOPF & HARR, P.C.

/s/ Julian P. Vasek

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CHAPTER 7 TRUSTEE**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he conferred with opposing counsel on June 11, 2024, regarding the relief requested herein, as required by Rule 37(a)(1), but to date the Defendants have failed to remedy any of the deficiencies described in the Trustee's accompanying brief.

/s/ Julian P. Vasek

Julian P. Vasek

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 21st day of June, 2024, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof, including on 18920, Zakharyayev, and Pinkhasova through Michael Cancienne and Joseph Golinkin, their counsel of record.

/s/ Julian P. Vasek

Julian P. Vasek